

# **EXHIBIT 3**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

ABRIELLE LONDO,

Plaintiff,

Civil Action

-vs-

Case No. 2:20-cv-53

Hon. Paul L. Maloney

ENRIGHT FAMILY RESTAURANTS,

D/B/A BIG BOY, and STEVE

WHELAN, Individually.

Defendants.

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The Deposition of STEVE WHELAN,

Taken via Veritext Remote,

Commencing at 3:30 p.m.,

Tuesday, March 30, 2021,

Before Rhonda M. Foster, CRR, RMR, RPR, CSR-3612.

Court reporter, attorneys and witness appearing remotely.

1           those things?

2       A.     No.

3       Q.     Did Abbey ever share with you that she was the survivor  
4           of domestic violence?

5       A.     Maybe.

6       Q.     What other sort of things did you and Abbey do outside  
7           of work?

8       A.     I bought a car from her, so she -- the bank was trying  
9           to take it back or something, I bought it, so we were  
10          going to try and sell it for more than what I had to  
11          pay the bank.

12      Q.     Did that end up working out?

13      A.     Not -- we couldn't get what we wanted for it.

14      Q.     Did it end up selling?

15      A.     It did -- well, I kept it for my daughter for a while  
16          and then I sold it later.

17      Q.     What kind of a car was it?

18      A.     Chevy Impala.

19      Q.     Okay. What year was that car?

20      A.     2012 or '13, I don't remember.

21      Q.     Did it run pretty good?

22      A.     It had some issues right when we went to -- tried to  
23          sell it. We had to get some stuff fixed on it. I  
24          don't remember everything. But the check engine light  
25          was on, all of those things.

1 Q. And Abbey told you she wasn't interested that way?

2 A. No.

3 Q. You weren't happy that she did not want you  
4 romantically, were you?

5 A. Excuse me?

6 MR. TOUTANT: Objection to the form of the  
7 question.

8 BY MS. BURINK:

9 Q. Sure. Were you upset that Abbey was not interested in  
10 you romantically?

11 MR. TOUTANT: Same objection.

12 BY MS. BURINK:

13 Q. Do you understand the question?

14 A. Say it again in a different form.

15 Q. Okay. Were you upset that Abbey did not want to date  
16 you romantically?

17 MR. TOUTANT: I am going to object to the  
18 form of the question because it implies that  
19 it's -- its underlying premise --

20 MS. BURINK: You know what, I will just  
21 scratch that last question. That's totally fine.

22 BY MS. BURINK:

23 Q. I can ask you a different question.

24 Did you ever hang out with Abbey in a group  
25 setting outside work?

1 didn't happen that day. And he left.

2 Q. Didn't you say that Mrs. Goodreau complained that  
3 Mr. Outlaw had rubbed her arm before?

4 A. On Sunday she said that, yes.

5 Q. And did you address that with Mr. Outlaw?

6 A. Yes.

7 Q. Okay. So that's what I am trying to find out.

8 What did you do to Mr. Outlaw to prevent this  
9 from happening again?

10 A. I haven't talked to him. He walked out.

11 Q. Is he still an employee?

12 A. As of right now, no.

13 Q. Do you plan on bringing him back?

14 A. I have to talk to him first.

15 Q. Is Ms. Goodreau still employed?

16 A. No.

17 Q. Why is she not an employee?

18 A. She called him a ni[REDACTED]r three times.

19 Q. Were you -- did you witness this?

20 A. No.

21 Q. Did anybody witness it?

22 A. Yes.

23 Q. Who witnessed it?

24 A. Brandon Smaby.

25 Q. Uh-huh.

1 A. I don't remember who else. Other people heard it. It  
2 was very loud.

3 Q. Did you get witness statements from anybody?

4 A. No.

5 Q. And who told you that this situation happened?

6 A. I heard loud screaming. I didn't know what they were  
7 saying. But Shawn told me, and then Brandon said he  
8 heard it. And I can't remember who else was there that  
9 day.

10 Q. Did you ask Ms. Goodreau if she had said that?

11 A. Yes.

12 Q. And what did she say?

13 A. Yes.

14 Q. Did Ms. Goodreau tell you that Mr. Outlaw referred to  
15 her as a crackhead whore bitch?

16 A. Did she what?

17 Q. Did she inform you that Mr. Outlaw referred to her as a  
18 crackhead whore bitch?

19 MR. TOUTANT: What's the relevance of this to  
20 this case?

21 MS. BURINK: Really? These statements that  
22 are creating a hostile work environment that he allows  
23 this employee to remain employed?

24 MR. TOUTANT: Ms. Goodreau isn't a party to  
25 this lawsuit.

1 A. Complaints from customers, complaints from employees,  
2 complaints from her.

3 Q. What were complaints from her?

4 A. About her section.

5 Q. What were the complaints regarding her section?

6 A. She said she got put in the worst section.

7 Q. Did you address that complaint?

8 A. Yeah.

9 Q. Did she ever tell that you she believed that she was  
10 being placed in that section because she refused to go  
11 out on dates with you?

12 A. No.

13 Q. Because she refused to engage in any further sexual  
14 conduct?

15 A. No.

16 Q. Were you upset at her for complaining to you about the  
17 inappropriate conduct?

18 A. What?

19 MR. TOUTANT: Object to the form of the  
20 question.

21 MS. BURINK: Yeah. I am sorry.

22 MR. TOUTANT: Once again, the question  
23 presupposes an answer that is based on --

24 MS. BURINK: The question is withdrawn.

25 MR. TOUTANT: Can you stop interrupting me?